

FF.3 Final NPL Listing to RI/FS Start Duration

Section 1 - Program Activity Information

1.1 Program Activity: Final NPL Listing to RI/FS Start Duration

1.2 Program Activity Category: GPRA Annual Program Measure

1.3 Program Area: Federal Facility

1.4 EPA Sponsor:

Subject Matter Expert	Subject Area	Phone #
Josh Barber	Federal Facility	(703) 603-0265

Section 2 - Problem/Decision Objective

2.1 Problem: The objective of this measure is to focus attention on the statutory requirement that Superfund Amendments and Reauthorization Act (SARA) Section 120(e) states “not later than six months after the inclusion of any facility on the NPL, the department, agency, or instrumentality shall ... commence a RI/FS for such facility.” There is a reporting need to measure the duration between from final NPL Listing to the first RI/FS start.

2.2 Stakeholder(s): Headquarters Remedy staff, Regional IMCs, RPMs, Site Managers, Congress and the Public.

2.3 Decision-maker(s): CERCLIS is updated from the SNAP application with the actual date for the Final NPL listing based on the actual Federal Register listing. This information is reverse snapshot to WasteLAN. The application calculates the duration based on these dates. The regions are responsible for entering start dates for the first RI/FS into WasteLAN the. Users with roles that allow data entry on the project schedule are permitted to enter the required data for these decisions.

2.4 Decision: In order to track and assess EPA’s ability to meet the statutory requirement, the WasteLAN application includes a procedure to calculate the days and time frame from the final NPL listing to the first RI/FS start. Sites with time frames greater than 180 days will be deemed not to have met this requirement. The CERCLIS procedure computes, by site, the interval between the final NPL listing (publication of the final listing in the Federal Register) and the actual date for the first RI/FS start. The duration is calculated based on the RI/FS start definition (see below) and the final NPL listing (Action Name = Final Listing on NPL) actual completion date (Actual Complete). Sites with time frames greater than 180 days will be deemed not to have met this requirement

Valid RI/FS actions in WasteLAN include: FF RI/FS (action code = LW), FF RI (action code = NH), or RCRA Facility Investigation (action code = MX). The RI/FS start is defined as follows:

- Sites where there has been no RI/FS or RFI work started prior to the effective date of the FFA/IAG, the actual start date (Actual Start) is the EPA or State receipt of a draft work plan for the RI/FS or RFI; or

- Sites where RI/FS or RFI work has been started prior to the FFA/IAG effective date and there has been substantial EPA or State involvement (EPA or the State has reviewed and commented, approved/concurred, or accepted the work plan), the actual start date (Actual Start) is also the date of receipt of a draft RI/FS or RFI work plan (Note: this date will be prior to IAG completion date); or
- Sites where RI/FS or RFI work starts prior to the FFA/IAG effective date and there has been limited EPA or State involvement, the date of the RI/FS or RFI actual start date (Actual Start) is the latter date that EPA or the State and the other agency sign the FFA/IAG.

Section 3 - Information Needs

Name	Source	System	Table/Column
Site ID/Site Name	Discovery document, Region	WasteLAN/SNAP	Site/Site_Id
Federal Facility		WasteLAN	Site.rfed_fctly_code = Y
Final NPL Listing action	Federal Register listing; RI/FS	SNAP (Federal Register listing) WasteLAN (RI/FS)	Action/rat_code, action_code_id where rat_code = NF
Final NPL Listing actual completion date	Federal Register	SNAP	Action/act_actl_cmplt_n_date is NOT null
Federal Facility RI/FS action	Federal Register listing; RI/FS	SNAP (Federal Register listing) WasteLAN (RI/FS)	Action/rat_code, action_code_id where rat_code = LW
RI/FS actual start date	RI/FS	WasteLAN	Action/act_actl_strt_date within user selected range
RI/FS Lead Code	RI/FS	WasteLAN	Action.ralt_code = FF
RI/FS Anomaly Code	RI/FS	WasteLAN	action.raa_code <> 'PS' OR 'PB' OR 'TN' OR 'TT' OR 'OA' OR 'OS'

Section 4 - Scope/Universe

This measure addresses only Federal facility sites for which a Final NPL Listing and valid RI/FS actions (with completion and start dates, respectively) have been entered into WasteLAN.

Section 5 - Data Quality Requirements

- 5.1 Completeness. In order to compute the duration, a Final Listing on NPL action (NF) must exist on the project schedule for the site and have an actual completion date, AND an RI/FS (LW or NH or MX) action must exist in the project schedule for the site with an actual start date. The procedure is run annually for reporting and analysis purposes and will list all sites and duration information. The DQO applies to all Federal Facilities Sites in CERCLIS with Final NPL listing recorded. Sites with time frames greater than 180 days will be deemed not to have met this requirement

5.2 Accuracy: The Final NPL Listing action dates are set to the actual Listing data when published in the Federal Register. The RI/FS start date is clearly defined in the Superfund Program implementation manual and should match the specified action dates (start or complete) for the noted action/subactions in Section 2.4)

Most accurate - Data is reported in an official decision source document. There is objective evidence (documentation that a third party can examine and arrive at the same conclusion) to support the accomplishment of this measure

5.3 Timeliness: This measure is based on the Final NPL listing and initial RI/FS actions. Therefore, it's timeliness is dependent of the required for those actions. The HQ data sponsors reviews the data for this DQO semi-annually and contacts the appropriate regional staff to address any outstanding issues. Regions enter action information real time. Although the GPRA measure is counted at fiscal year end, the action data should be entered in a timely basis (within 5 working days of actual start/completion/signature of decision documentation).

5.4 Consistency: There are clear national definitions and guidance. Guidance on this measure is available in the Superfund Program Implementation Manual. Specifically, the RI/FS start date is clearly defined as related to the signature date of the FFA/IAG or receipt of a draft RI/FS workplan. As such, completion dates for these action/subactions should match the specified start date for the RI/FS (see Section 2.4)

Section 6 - Information Collection and Reporting

6.1 Source for the information: Federal Register publication, FFA/IAG, RI/FS

6.2 User interface: HQ enters via a database process the information for the Final NPL Listing actions actual completion date. This information is sent to the region by use of a database revision. User enters actions and actual start dates for RI/FS on the Project schedule. This information is snapshot from region to Headquarters. Headquarters can run the report that calculates the time frame data for all applicable sites.

6.3 System transfers This information is snapshot from region to Headquarters.

6.4 Internal outputs SCAP-14 Federal Facility; Federal Facility Accomplishment Report

6.5 Audit reports: Federal Facility Audit Report

6.6 External outputs: Annual Report to Congress

6.7 Guidance documentation:

- ▶ Superfund Program Implementation Manual (OSWER Directive 9200.3-14-1G-Q)